

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DRIVER ID INC., a Nevada corporation,

Plaintiff,

vs.

TRIPLE M FINANCING CO., a Michigan  
corporation, and PAYMENT PROTECTION  
SYSTEMS INC., a California corporation,

Defendants.

00-70645

Case No.

DENISE PAGE HOOD

MAGISTRATE JUDGE CARLSON

**COMPLAINT AND DEMAND FOR JURY TRIAL**

**Parties and Jurisdiction**

1. Plaintiff Driver ID Inc. is a Nevada corporation having a principal place of business at 19500 Middlebelt Road, Suite 201-W, Livonia, Michigan 48152.
2. Upon information and belief, Payment Protection Systems Inc. is a corporation of California having offices and a place of business at 42181 Avenida Alvarado, Suite B, Temecula, California 92590.
3. Upon information and belief, Defendant Triple M Financing Co. is a Michigan corporation having offices and a place of business at 24750 Greenfield Road, Oak Park, Michigan 48237.
4. This action arises under the patent laws of the United States. This Court has jurisdiction under 35 USC Section 281 and 28 USC Section 1338. Venue is proper under 28 USC Section 1400(b) and 28 USC Section 1391(c).

GIFFORD, KRASS, GROH, SPRINKLE, ANDERSON & CITKOWSKI P.C. 280 N. OLD WOODWARD AVENUE, STE. 400, BIRMINGHAM, MICHIGAN 48009-5394 (248) 647-6000

**Count I - Patent Infringement**

5. Plaintiff realleges Paragraphs 1-4 as if fully set forth herein.

6. Plaintiff is the owner by assignment of U.S. Letters Patent No. 5,519,260 issued May 21, 1996, a copy of which is attached to this complaint as Exhibit A.

7. Upon information and belief, Defendants have infringed said Letters Patent No. 5,519,260 and will continue to do so in this judicial district and elsewhere throughout the United States to the irreparable damage of Plaintiff unless enjoined by this Court; 35 USC Section 271(a), Section 271(b) and Section 271(c).

8. The aforementioned actions by Defendant have occurred with full knowledge of Plaintiff's patent rights.

9. The aforementioned acts constitute willful infringement of said Letters Patent No. 5,519,260.

WHEREFORE, Plaintiff prays that:

1. the Defendants, officers, agents, employees, successors and assigns and all persons or entities holding by, through or under them and all those acting for them or in their behalf, be preliminarily enjoined during the pendency of this action and thereafter permanently enjoined from further infringement of Plaintiff's Letters Patent No. 5,519,260.

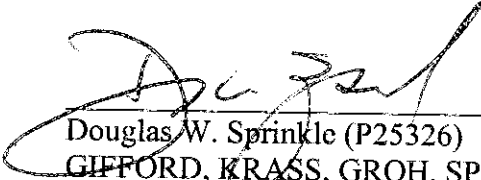
2. the Defendants, both severally and jointly, account for and pay to Plaintiff all damages sustained by Plaintiff as determined by the jury by reasons of Defendants' infringement of said Letters Patent.

3. this Court declare this case to be exceptional pursuant to 35 USC Section 285 and award Plaintiff triple damages as determined by the jury together with Plaintiff's attorney fees and costs associated with this action.

GIFFORD, KRASS, GROH, SPRINKLE, ANDERSON & CITKOWSKI, P.C. 280 N. OLD WOODWARD AVENUE, STE. 400, BIRMINGHAM, MICHIGAN 48009-5384 (248) 647-6000

4. Plaintiff be granted such other and further relief as this Court deems just and equitable.

Respectfully submitted,

  
Douglas W. Sprinkle (P25326)  
GIFFORD, KRASS, GROH, SPRINKLE,  
ANDERSON & CITKOWSKI, P.C.  
280 N. Old Woodward, Suite 400  
Birmingham, MI 48009  
(248) 647-6000  
Fax: (248) 647-5210

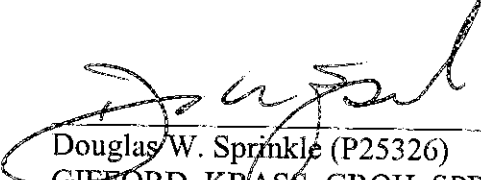
Attorneys for Plaintiff

Date: 2/3/00

**JURY DEMAND**

Plaintiff demands a trial by jury on all issues so triable.

Respectfully submitted,

  
Douglas W. Sprinkle (P25326)  
GIFFORD, KRASS, GROH, SPRINKLE,  
ANDERSON & CITKOWSKI, P.C.  
280 N. Old Woodward, Suite 400  
Birmingham, MI 48009  
(248) 647-6000  
Fax: (248) 647-5210

Attorneys for Plaintiff

Date: 2/3/00

DWS/gS

GS-C:\docs\DWS\WVA10080-cit.doc

GIFFORD, KRASS, GROH, SPRINKLE, ANDERSON & CITKOWSKI, P.C. 280 N. OLD WOODWARD AVENUE, STE. 400, BIRMINGHAM, MICHIGAN 48009-5394 (248) 647-6000

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

SEE CASE FILE FOR  
ADDITIONAL  
DOCUMENTS OR PAGES  
THAT WERE NOT  
SCANNED